

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

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**PLAINTIFF'S MOTION TO SUBMIT AUDIO FILES CONVENTIONALLY IN  
CONNECTION WITH OPPOSITION TO MOTION TO DISMISS**

Plaintiff Jane Doe, by and through her undersigned counsel, respectfully moves this Court for leave to submit two audio files conventionally in connection with her Opposition to Defendant's Motion to Dismiss Amended Complaint ("Opposition")(ECF No. 139), and in support, states as follows:

1. In her Opposition, Plaintiff relied, in part, on two links to short clips from YouTube videos. Id., p. 13, ¶ 1. On September 8, 2025, Defendant was on Foodshop's (streamer) livestream when he expressly admitted to using Artificial Intelligence to format data into the Excel spreadsheet that he created and submitted as Exhibit E to his declaration (ECF 132-6). Id. ([https://youtu.be/JXFl4fBob\\_4?t=6937](https://youtu.be/JXFl4fBob_4?t=6937)).

2. On September 9, 2025, Defendant was on Foodshop's livestream when he expressly admitted to having deleted the "original file," and to "artificially creating a file by reconstructing a log." Id. (<https://www.youtube.com/watch?v=UEnB49z9l0s&t=15704s>).

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3. On October 6, 2025, the streamer Foodshop posted on social media that she had privatized the two videos so that they are no longer publicly accessible, and thus cannot be accessed by the Court.

4. Furthermore, on October 6, 2025, the Court ordered that, “on a going forward basis,” “any links to images or online documents” must be included as exhibits, and that it will not open random links. ECF 143, p. 15. Plaintiff’s Opposition was filed on October 3, thus preceding the Court’s order. Accordingly, Plaintiff now seeks to comply with the Court’s order.

5. Plaintiff requests that the Court enter an order allowing Plaintiff to submit the two referenced links in the form of two audio files, and submitted conventionally via a USB drive.

**WHEREFORE**, Plaintiff respectfully requests that the Court grant this Motion, and enter an order allowing Plaintiff to conventionally submit via a USB drive the two links relied on in her Opposition (ECF 139, p. 13, ¶ 1).

Dated: October 17, 2025.

Respectfully submitted,

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By: \_\_\_\_\_  
CARLOS A. GARCIA PEREZ

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**CERTIFICATE OF CONFERRAL PURSUANT TO LOCAL RULE 7.1(a)(2)**

WE HEREBY CERTIFY that Plaintiff's counsel conferred with counsel for Defendant regarding the relief requested in this Motion but were unable to reach a resolution.



By: \_\_\_\_\_  
CARLOS A. GARCIA PEREZ  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this same day a true and correct copy of the foregoing was served on all parties via the CM/ECF filing portal to all counsel of record.



By: \_\_\_\_\_  
CARLOS A. GARCIA PEREZ  
Attorney for Plaintiff